

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

BRENDA J. VALENTINE)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-1359-MSN-TCB
)	
THE HEALTH & WELLNESS CENTER,)	
INC.)	
)	
Defendant.)	

**JOINT MOTION REQUESTING STAY OF DEADLINES TO FINALIZE
SETTLEMENT AND MOTION TO CONTINUE FINAL PRETRIAL TO MAY 19, 2022**

The parties, Brenda J. Valentine (“Plaintiff”) and The Health & Wellness Center, Inc. (“Defendant”), jointly move the Court for an Order staying the deadlines in this case in order to allow the parties time to finalize a settlement. In support of this Consent Motion, the parties state as follows:

1. The parties reached a settlement of their dispute in principle on April 6, 2022 and require sufficient time to complete the final settlement agreement.
2. The Parties will need at least 30 days to prepare the agreement and meet obligations under same.
3. Plaintiff and Defendant jointly request the Court stay all deadlines in this case and continue the Final Pretrial Conference presently set for April 21, 2022 by one month to May 19, 2022, or such other time so as to allow sufficient time to finalize the settlement and file a Stipulation of Dismissal.

3. The parties acknowledge that Local Rule 7(G) provides that “[n]o continuance will be granted other than for good cause and upon such terms as the Court may impose”; that Local Rule 7(I) provides that “[a]ny requests for an extension of time relating to motions must be in writing and, in general, will be looked upon with disfavor”; and that Local Rule 37(F) provides that “[a]ny agreement between counsel relating to any extension of time is of no force or effect; only the Court, after appropriate motion directed thereto, may grant leave for any extension of time.”

4. The parties submit that good cause exists to grant this motion. It is not sought for any improper purpose; rather, it is to allow the parties adequate time finalize their settlement. Additionally, granting this motion and staying all deadlines will conserve judicial resources that would otherwise be required for the final pretrial conference, and will conserve the parties’ resources that would otherwise be required to comply with the discovery deadlines in a case that has otherwise been resolved.

WHEREFORE, for the foregoing reasons, and for good cause shown, the parties respectfully request that the Court grant this Joint Motion Requesting Stay of Deadlines to Finalize Settlement and Motion to Continue Final Pretrial to May 19, 2022.

[SIGNATURES ON THE FOLLOWING PAGE]

Dated: April 14, 2022

Respectfully Submitted,

Plaintiff and Defendant
By Counsel

/s/ Matthew T. Sutter

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2022 the foregoing, **JOINT MOTION REQUESTING STAY OF DEADLINES TO FINALIZE SETTLEMENT AND MOTION TO CONTINUE FINAL PRETRIAL TO MAY 19, 2022** was electronically filed using the Court's electronic filing system and that system sent notice on the following:

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